

File No. 1694-9

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN THE MATTER OF:

Chapter 13

Bernice Powell
Henry Keith Powell,

Case No. 07-018674

Honorable Judge Goldgar

Debtors.

**RESPONSE TO NOTICE OF CURE OF ALL PRE-PETITION
MORTGAGE OBLIGATION**

Now comes, Litton Loan Servicing, LP and files this Response to the Trustee's Notice of Final Mortgage Cure Amount and in support states as follows:

1. That on June 26, 2009, Chapter 13 Marilyn O. Marshall filed a Notice of Payment of Final Mortgage Cure Amount. The Notice was subsequently served on Litton and required it to file a response within sixty days of said Notice if the loan is not post-petition current. This response is being filed within that time frame.

2. The Debtors are not current on their post-petition mortgage payments regarding Litton's second mortgage regarding the real estate located at: 936 Hinman Avenue Unit G, Evanston, Illinois 60202 ("Real Estate").

3. That since there is a post petition default the mortgage should not be considered fully reinstated.

4. The loan is post petition due for May 1, 2008. The following is due and owing:

- i. May 1, 2008 to August 1, 2009 at \$481.24 each for a total of \$7,700.64; and,
- ii. Late charges of \$409.02;

That the total post petition default totals \$8,109.66. That based upon Debtor's post-petition default, the mortgagee is not required to treat the mortgage reinstated and fully current.

That the creditor reserves the right to amend this response.

Respectfully submitted,

/s/ Mitchell A. Lieberman
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